

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	CASE NO. 1:20-cr-358
	)	
Plaintiff	)	JUDGE SARA LIOI
-vs-	)	
	)	
ROBERT D. McWILLIAMS,	)	<u>MOTION TO PERMIT FILING OF</u>
	)	<u>SENTENCING MEMORANDUM</u>
	)	<u>UNDER SEAL</u>
Defendant	)	

Now comes the Defendant, by and through the undersigned counsel and hereby respectfully moves this Honorable Court for an Order permitting him to file his sentencing Memorandum and exhibits thereto under seal pursuant to Local Crim. R. 49.4

As grounds herefor, the undersigned counsel submits that portions of his sentencing memorandum will contain reference to materials that contain HIPPA protected material as well as references to persons not party to this case. Additionally, the materials are directed only to this Court's sentencing decision and are relevant for no other purpose in the case.

WHEREFORE, it is respectfully requested that this Motion be granted.

Respectfully submitted,

/s/ Robert A. Dixon  
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**CERTIFICATE OF SERVICE**

This document was filed via the ECF system for the U.S. District Court for the Northern District of Ohio and served upon all parties by operation of that system, this 30<sup>th</sup> day of October, 2021.

/s/ Robert A. Dixon  
ROBERT A. DIXON  
Attorney for Defendant